≡ AT&T

Amy L. Alvarez
District Manager
Federal Government Affairs

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2315
FAX 202-263-2601
email: alalvarez@att.com

June 3, 2002

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: *Application by Verizon-New Jersey Inc. for Authorization to Provide In-Region,*
       InterLATA Services in the State of New Jersey, Docket 02-67

       Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange
       Carriers, Docket 01-338

       Implementation of the Local Competition Provisions of the Telecommunications Act of
       the 1996, Docket 96-98

       Deployment of Wireline Services Offering Advanced Telecommunications Capability,
       Docket 98-147
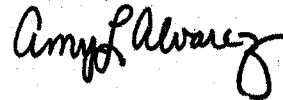
Dear Ms. Dortch:

        On Friday, May 31, 2002, Robert Quinn and the undersigned, both of AT&T, met with Bryan
Tramont of Commissioner Abernathy's office. Frederick Pappalardo, also of AT&T, participated by
telephone. During this meeting, AT&T reiterated its arguments that Verizon's recurring and non-
recurring rates in New Jersey fail to satisfy checklist item two. Specifically, AT&T demonstrated that
Verizon's switching and daily usage file rates and non-recurring charges for hot cuts and vertical feature
changes are not cost-based and are inflated by clear TELRIC errors. As part of this discussion, we also
referred to AT&T's comments filed in the above-referenced Triennial Review dockets which highlight
the need to establish some form of electronic loop provisioning in order to accelerate the development of
facilities-based local competition. We explained that the technology to support electronic provisioning is
technically feasible and available today and that electronic provisioning could eliminate some of the
enormous financial and technical obstacles to facilities-based competition that currently exist.

        In addition, AT&T expressed its ongoing concern with the accuracy of Verizon's performance

data. The attached letter, which Verizon filed with the New Jersey Board of Public Utilities on May 28, 2002, provided the basis for this discussion.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Amy L Alvarez

cc: Alexis Johns
Susan Pie
Ann Berkowitz

May 28, 2002

Kristi Izzo, Secretary
Board of Public Utilities
Two Gateway Center
Newark, NJ 07102

      Re: **Verizon NJ C2C Report Certification -- November 2001 through February 2002**
              Docket No. TX98010010

Dear Secretary Izzo:

      Enclosed, pursuant to the Board's Order of March 28, 2002 (Order), are an original and 10 copies of Verizon's certifications for the Carrier to Carrier reports for the months of November 2001 through February 2002.   Each of the issues identified in the attached matrix has been earlier communicated to the Board and to the CLEC community through Change Control Notifiers and the Wholesale Log process.

      In accordance with the Order, the undersigned, an officer of Verizon New Jersey Inc., respectfully certifies that revisions to the monthly report are necessary and either have been or will be implemented as indicated in the comments column of the attached matrix. Please note that as indicated in that column, in a few instances, data cannot be produced retroactively.

      Please feel free to contact the undersigned should the Board require further information.

                         Very truly yours,

                         Bruce D. Cohen

Enclosures
BDC:dmp
cc: TSFT Service List
     Mr. James Corcoran

November 2001 through February 2002 Report Months

PREORDERING			
CC NUMBER/ IMPLEMENTATION DATE BY DATA MONTH	**REPORT MONTHS**	**METRICS**	**COMMENTS**
2001-00900 Jan. 2002	Nov. & Dec. 2001	PO-1	EDI code revised to resolve error in transaction monitoring application. Data are not available retroactively
2002-03758 Feb. 2002	Dec. 2001 Jan. 2002	PO-2	Although new server added pair, EnView transactions continued to be routed to an existing server pair. Modification made to distribute EnView transactions over all EDI servers.
2001-03248 Dec. 2001	Nov. 2001	PO-2-02	Error in handling routines used to process failed transactions, and failures in coding and testing of the template enhancements. Corrected EDI parser server templates, coded to stop certain transactions from failing, and properly marked failed transactions. Changed EnView Script to deliver 10-digit telephone number in NJ to avoid failures. Data are not available retroactively.
2001-03145 2001-03258 Dec. 2001	Nov. 2001	PO-2-02 PO-1-07	New server added pair but EnView transactions continued to be routed to existing server pair only. Distributed EnView transactions over all EDI servers. Data are not available retroactively.

ORDERING			
CC NUMBER/ IMPLEMENTATION DATE BY DATA MONTH	**REPORT MONTHS**	**METRICS**	**COMMENTS**
2001-01877 Jul. 2002 (Estimated)	Nov. & Dec. 2001 Jan. & Feb. 2002	OR-1-03 OR-2-03 OR-1-04 OR-2-04 OR-1-05 OR-2-05 OR-1-06 OR-2-06 OR-1-07 OR-2-07 OR-1-08 OR-2-08 OR-1-09 OR-2-09 OR-1-10 OR-2-10	Code changed to count only unique logical lines on a single PON; identify DIDs and return a value of 10. Data are not available retroactively.
2001-02320 Feb. 2002	Nov. & Dec. 2001 Jan. 2002	OR-1 OR-2	Updated tables to include all combinations of NC, NCI, and SECNCI codes which were previously not identified.
2001-03230 Jan. 2002	Nov. & Dec. 2001	OR-1-03 OR-2-03 OR-1-04 OR-2-04 OR-1-05 OR-2-05 OR-1-06 OR-2-06 OR-1-07 OR-2-07 OR-1-08 OR-2-08 OR-1-09 OR-2-09 OR-1-10 OR-2-10	Changed code to correctly categorize Infospeed as POTS/PreQualified and not Specials.
2002-03728 Jan. 2002	Nov. & Dec. 2001	OR-5-02	The definition of "Basic POTS" was not coded properly. Changed code to exclude Pre-Qualified complex orders.
2002-03822	Nov & Dec. 2001	OR-1-03 OR-2-03	Coding logic incorrectly excluded disconnects. Changed

ORDERING			
CC NUMBER/ IMPLEMENTA- TION DATE BY DATA MONTH	**REPORT MONTHS**	**METRICS**	**COMMENTS**
2002-04003 Mar. 2002	Jan. & Feb. 2002	OR-1-04 OR-2-04 OR-1-05 OR-2-05 OR-1-06 OR-2-06 OR-1-07 OR-2-07 OR-1-08 OR-2-08 OR-1-09 OR-2-09 OR-1-10 OR-2-10 OR-1-11 OR-2-11 OR-1-12 OR-2-12	code to include ASR disconnect orders.
2002-04033 Feb. 2002	Nov. & Dec. 2001 Jan. 2002	OR-2-03 OR-2-07 OR-2-04 OR-2-08 OR-2-05 OR-2-09 OR-2-06 OR-2-10	Evidentiary system coded the actions related to the OR1 metrics separate from the actions related to OR2 metrics. Changed code to exclude any subsequent reject/query that is identical to the first reject/query issued against a unique PON.
2002-04039 Feb. 2002	Nov. & Dec. 2001 Jan. 2002	OR-4-06 OR-4-07 OR-4-08	The Guidelines were not translated properly to the specifications provided for coding. Changed code to exclude CABS orders.
2002-04040 Feb. 2002	Nov. & Dec. 2001 Jan. 2002	OR-4-06	Coding logic incorrectly excluded weekends and holidays. Code corrected.
2002-04243 Mar. 2002	Nov &, Dec. 2001 Jan & Feb. 2002	OR-1-05 OR-2-04 OR-1-06 OR-2-05 OR-2-03 OR-2-06	Some states guideline state that facility checks are not required for orders less than five lines. This requirement was incorrectly applied to the code for New Jersey. Corrected code so that all DS0, DS1 and DS3 ASRs are included in the >=6 lines measure, as well as the ASRs for other Specials that require a facility check.
2002-04285 Jul. 2002 (Estimated)	Nov. & Dec. 2001 Jan. & Feb. 2002	OR-4-09 OR-4-10	An incomplete analysis of the guideline requirements resulted in the extrapolation of the incorrect SOP Completion Date. Modified the SOP Completion Date field to contain the SOP Completion Date.

PROVISIONING			
CC NUMBER/ IMPLEMENTA- TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS
2001-01801 Dec. 2001	Nov. 2001	PR-1-01 PR-2-11 PR-1-02 PR-4-01 PR-1-06 PR-4-02 PR-1-07 PR-4-03 PR-1-08 PR-4-08 PR-1-10 PR-4-09 PR-1-11 PR-5-01 PR-2-01 PR-5-02 PR-2-02 PR-5-03 PR-2-06 PR-6-01 PR-2-07 PR-6-03 PR-2-08 PR-8-01 PR-2-10 PR-8-02	Code corrected to identify and include CABS billed Retail Specials and include appointment or missed appointment type codes.
2001-02791 Dec. 2001	Nov. 2001	PR-1-01 PR-1-02 PR-1-08 PR-2-01 PR-2-08 PR-4-01	OC products incorrectly included in the DS3 category. Removed OC products from DS3 metrics and included in the Specials Other categories.
2001-03284 Dec. 2001	Nov. 2001	PR-1-09 PR-2-09	Guidelines were not followed. Generate and Report DS3 as Retail compare for PR-1-09. Shade Retail cell for PR-2-09.
2002-03614 Dec. 2001	Nov. 2001	PR-6-01 PR-6-03	Inaccurate technical definition provided during transition from manual to mechanized process. Changed code for product identification of UNE, Resale and Retail troubles.
2002-03843 Apr. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-6-01 PR-6-03	All DS1 pipe orders were not included. Modified code to recapture Retail and Resale DS1 installation activity.
2002-03894 Dec. 2001	Nov. 2001	PR-4-05 PR-6-01	An incorrect formula and source file was loaded into the monthly environment after the production file was loaded. Corrected metric identifier.

PROVISIONING			
CC NUMBER/ IMPLEMENTA- TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS
2002-03959 Mar. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-1-01 PR-4-01 PR-1-02 PR-4-02 PR-1-06 PR-4-03 PR-1-07 PR-4-08 PR-1-08 PR-5-01 PR-1-12 PR-5-02 PR-2-01 PR-5-03 PR-2-02 PR-6-01 PR-2-06 PR-6-03 PR-2-07 PR-7-01 PR-2-08 PR-8-01 PR-2-18 PR-8-02	Data was incorrectly formatted during an extract process. Modified SORD extract program.
2002-04067 Mar. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-1-01 PR-1-08 PR-1-02 PR-1-09 PR-1-06 PR-1-12 PR-1-07	Erroneous line of code caused W coded cancelled orders to be omitted. Code fixed.
2002-04185 May 2002 (Estimated)	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-1-01 PR-1-02 PR-2-01 PR-2-02 PR-3-03 PR-3-08 PR-3-10 PR-3-11	Fixed code to calculate PON interval using next business day when the desired due date is on a weekend or holiday.
2002-04205 Apr. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-4-05	Baseline set of code used to implement official reporting did not have appropriate exclusions. Changed code to exclude no dispatch orders.
2002-04430 Apr. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	PR-4-04	Baseline set of code used to implement official reporting did not have appropriate exclusions. Changed code to exclude no dispatch orders.

MAINTENANCE & REPAIR			
CC NUMBER/ IMPLEMENTA- TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS

MAINTENANCE & REPAIR			
CC NUMBER/ IMPLEMENTA-TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS
2002-03601 Dec. 2001	Nov. 2001	MR-2-01 MR-2-05 MR-4-01 MR-4-02 MR-4-04 MR-4-06 MR-4-07 MR-4-08 MR-5-01	Inaccurate technical definition was provided during transition from manual to mechanized process. Code changed for product identification of UNE, Resale and Retail Troubles.
2002-03613 Dec. 2001	Nov. 2001	MR-2-01 MR-2-05	Inaccurate technical definition was provided during transition from manual to mechanized process. Removed DI PBX trunks/circuits from Specials line count.
2002-03655 Dec. 2001	Nov. 2001	MR-2-01 MR-2-05	Inaccurate technical definition was provided during transition from manual to mechanized process. Code changed for identifying Resale Specials line counts. Data are not available retroactively.
2002-03787 Jan. 2002	Nov. & Dec. 2001	MR-1-06	Changed code to include all MLT transactions with error conditions that were excluded in error.
2002-04082 Feb. 2002	Nov. & Dec. 2001 Jan. 2002	MR-1-02	Monthly release coding error. Changed code to include legacy response time.

NETWORK PERFORMANCE			
CC NUMBER/ IMPLEMENTA-TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS
2002-03909 Jan. 2002	Nov. & Dec. 2001	NP-5-01	Methods & Procedures for calculation of metric not followed. Adhere to process for metric calculation.
2002-04318 Mar. 2002	Nov. & Dec. 2001 Jan. & Feb. 2002	NP-1-01 NP-1-03 NP-1-02 NP-1-04	Inconsistent process for identifying trunk groups. Process fixed.

BILLING			
CC NUMBER/ IMPLEMENTA- TION DATE BY DATA MONTH	REPORT MONTHS	METRICS	COMMENTS
2002-03244 Jan. 2002	Nov. & Dec. 2001	BI-5	Programming Logic error. Changed program logic to add totals for file counts.
2002-04182 Mar. 2002	Jan. & Feb. 2002	BI-2-01 BI-2-02	Error in the implementation of new CABS program. Corrected the code to include CABS bills.
2002-04383 Mar. 2002	Feb. 2002	BI-3-01 BI-7-01 BI-3-03 BI-7-02 BI-3-03 BI-8-01 BI-6-01 BI-8-02 BI-6-02	A table in CABS was incorrectly labeled. Corrected CABS database to prevent record from being omitted.